

Message

From: McCaskill Amy USRS [Amy.McCaskill@syngenta.com]
Sent: 3/14/2022 3:47:07 PM
To: Hathaway, Margaret [Hathaway.Margaret@epa.gov]; Jeffrey H Birk [jeffrey.birk@basf.com]; Steven Callen [steven.callen@bayer.com]; George Sabbagh [george.sabbagh@bayer.com]; Thomas Orr [thomas.orr@bayer.com]; Janet Hou [janet.hou@basf.com]
CC: Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Roe, Lindsay [Roe.Lindsay@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]; Meadows, Sarah [Meadows.Sarah@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Subject: RE: [EXT] RE: Updated Draft Dicamba Terms - RE: Dicamba OTT Discussion
Attachments: Registrant Comments Dicamba Draft Terms_clean-edits-highlighted-3-10-2022_post registrant call.docx

Flag: Follow up

Hi Meg,

We think that would be feasible. Please see attached draft with the few remaining comments we have. We are happy to meet again should you deem it necessary.

Best Regards,

Amy McCaskill (she/her)
Sr Federal Regulatory Manager, US Herbicide Portfolio

From: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Sent: Monday, March 14, 2022 11:08 AM
To: McCaskill Amy USRS <Amy.McCaskill@syngenta.com>; Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; George Sabbagh <george.sabbagh@bayer.com>; Thomas Orr <thomas.orr@bayer.com>; Janet Hou <janet.hou@basf.com>
Cc: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: [EXT] RE: Updated Draft Dicamba Terms - RE: Dicamba OTT Discussion

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Hello Amy:

OPP suggests draft correspondence be sent within five business days after approval of the action. Would that be feasible?

Margaret Hathaway (Meg)
Senior Regulatory Specialist
U.S. Environmental Protection Agency
OCSPP: Office of Pesticide Programs
Registration Division – Herbicide Branch
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(202) 566-2730

From: McCaskill Amy USRS <Amy.McCaskill@syngenta.com>
Sent: Monday, March 14, 2022 9:56 AM

To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; George Sabbagh <george.sabbagh@bayer.com>; Thomas Orr <thomas.orr@bayer.com>; Janet Hou <janet.hou@basf.com>
Cc: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: [EXT] RE: Updated Draft Dicamba Terms - RE: Dicamba OTT Discussion

Thanks for that clarification. I had a question on that as well. Since EPA has asked for 7 days to review. Is there a timeframe by which you are expecting to receive the letter?

Best Regards,

Amy McCaskill (she/her)
Sr Federal Regulatory Manager, US Herbicide Portfolio

From: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Sent: Monday, March 14, 2022 9:28 AM
To: Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; McCaskill Amy USRS <Amy.McCaskill@syngenta.com>; George Sabbagh <george.sabbagh@bayer.com>; Thomas Orr <thomas.orr@bayer.com>; Janet Hou <janet.hou@basf.com>
Cc: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
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Hello Jeff:

In reply to your question, prior to initiating that correspondence as per section 3c. EPA would also to be able to view the final correspondence upon request if needed, but the main intent is for EPA to be able to look at that correspondence and provide comment before it is distributed.

Margaret Hathaway (Meg)
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From: Jeffrey H Birk <jeffrey.birk@basf.com>
Sent: Monday, March 14, 2022 9:09 AM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Steven Callen <steven.callen@bayer.com>; McCaskill Amy USRS <Amy.McCaskill@syngenta.com>; George Sabbagh <george.sabbagh@bayer.com>; Thomas Orr <thomas.orr@bayer.com>; Janet Hou <janet.hou@basf.com>
Cc: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Rosenblatt, Daniel

<Rosenblatt.Dan@epa.gov>

Subject: RE: [EXT] RE: Updated Draft Dicamba Terms - RE: Dicamba OTT Discussion

Hi Meg,

The three registrants have a meeting planned for 11:00 this morning in which we plan to go through the terms and conditions draft document and make any additional changes/comments. I expect that we will be able to send that revised document by this afternoon.

Perhaps you can provide a quick answer for one question that I have. Regarding the required correspondence with sellers and distributors, are the registrants required to submit that correspondence to EPA for review and comment prior to initiating that correspondence as per section 3c, or are we required to make it available to EPA upon request as per 2e?

2e. Registrant must send a report to EPA by XX/XX/2022 + 30 days detailing its efforts to accomplish all of the above. A copy of the training materials must be included with this report. Registrant must maintain copies of any correspondence it sends to all sellers, distributors, and purchasers and make them available to EPA upon request.

3c. Registrant will send, either to a valid and appropriate e-mail address and/or via mail, correspondence to all known sellers and distributors of this product to notify them of these changes. Registrant will send a copy of this correspondence to EPA prior to distribution of these materials. EPA will be offered at least seven days to review and EPA comments must be incorporated into the final materials.

Thanks,

Jeff

Jeffrey Birk
Product Registration Manager

Phone: +1 919 547-2622, Mobile: +1-919-225-9220, Fax: +1 919 547-2850, Email: jeffrey.birk@basf.com
Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States



BASF Corporation

From: Hathaway, Margaret <Hathaway.Margaret@epa.gov>
Sent: Monday, March 14, 2022 8:59 AM
To: Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; McCaskill Amy USRS <Amy.McCaskill@syngenta.com>; George Sabbagh <george.sabbagh@bayer.com>; Thomas Orr <thomas.orr@bayer.com>; Janet Hou <janet.hou@basf.com>; Dixon Monty USGR <monty.dixon@syngenta.com>
Cc: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: [EXT] RE: Updated Draft Dicamba Terms - RE: Dicamba OTT Discussion

Good morning, dicamba registrants:

ED_014195_00000804-00003

OPP would like to know how soon your companies plan to have a joint terms and conditions response prepared for Agency review. As you know, this is a priority action for Iowa and Minnesota.

Thank you,
Meg

Margaret Hathaway (Meg)
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From: Hathaway, Margaret
Sent: Thursday, March 10, 2022 4:00 PM
To: Jeffrey H Birk <jeffrey.birk@basf.com>; Steven Callen <steven.callen@bayer.com>; McCaskill Amy USRS <Amy.McCaskill@syngenta.com>; George Sabbagh <george.sabbagh@bayer.com>; Thomas Orr <thomas.orr@bayer.com>; Janet Hou <janet.hou@basf.com>; Dixon Monty USGR <monty.dixon@syngenta.com>
Cc: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Roe, Lindsay <Roe.Lindsay@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: Updated Draft Dicamba Terms - RE: Dicamba OTT Discussion

Dear Dicamba Registrants:

Please find the attached document containing the draft terms and conditions discussed during our 3pm meeting today. As noted previously, areas of recently revised text are flagged in blue or green highlighting. Comment bubbles identify places where feedback is particularly requested.

Best regards,
Meg

Margaret Hathaway (Meg)
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-----Original Appointment-----

From: Schmid, Emily <Schmid.Emily@epa.gov>
Sent: Thursday, March 10, 2022 8:32 AM
To: Schmid, Emily; Roe, Lindsay; Meadows, Sarah; Hathaway, Margaret; Rosenblatt, Daniel; Jeffrey H Birk; Steven Callen; McCaskill Amy USRS; George Sabbagh
Cc: Echeverria, Marietta; Dixon Monty USGR; Janet Hou; Thomas Orr
Subject: Dicamba OTT Discussion
When: Thursday, March 10, 2022 3:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

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